

## MARGARET M. SHALLEY

& ASSOCIATES, LLC

OF COUNSEL:
JAMES M. BRANDEN
JAMES SHALLEY

July 15, 2016

## BY ECF

The Honorable Katherine B. Forrest United States District Court Judge Southern District of New York 500 Pearl Street New York, New York 10007

**Re:** *United States v. Kevin Wilson* 11 Cr. 667 (KBF)

## Dear Judge Forrest:

I represent, the defendant, Kevin Wilson, in the above referenced matter. At the defendant's sentencing on June 27, 2016, counsel notified the Court of the defendant's desire to be placed in a Bureau of Prisons facility that has vocational programs. However, counsel was unsure whether the defendant's family would be relocating from New York City to North Carolina. The Court instructed counsel to submit a letter detailing this request. Counsel apologizes for the delay in submitting this letter; however it took some time for the defendant's family to determine whether they planned to relocate to North Carolina. There was additional difficulty in identifying a specific facility with vocational programs that is located near North Carolina and satisfies the Bureau of Prisons' security requirements.

Counsel understands that the defendant's request depends on the designation from the Bureau of Prisons based upon the "inmate security designation and custody classification," which is based on a number of factors; however, it seems that Mr. Wilson will most likely be classified as high security. Since it appears that the penitentiaries within a reasonable distance of the Raleigh-Durham area have comparable programs, we respectfully request that the Judgment be amended to reflect that Mr. Wilson be placed at a facility with vocational programs located as closely as possible to Raleigh, North Carolina so that the defendant may continue to visit with

his family. The Courts time and attention to this matter is greatly appreciated.

Respectfully submitted,

/s / Margaret M. Shalley Margaret M. Shalley, Esq.

cc: AUSA Jessica Lonergan AUSA Nola Heller